



## TOWN OF RAYMOND

### Public Works Department

Town Offices

4 Epping Street • Raymond, NH 03077

Tel: (603) 895-4735 • Fax: (603) 895-0903

**RECEIVED**

**MAR 03 2009**

**DEPARTMENT OF  
ENVIRONMENTAL SERVICES**

February 27, 2009

C. Wayne Ives  
NH Department of Environmental Services  
P.O. Box 95 – 29 Hazen Drive  
Concord, NH 03302-0095

Re: Lamprey Proposed Protected Instream Flow Report

Dear Mr. Ives:

I recently attended a meeting regarding a report recently completed by Normandeau Associates, UNH, and UMass, for the State of New Hampshire Department of Environmental Services (NHDES); relative to the Lamprey River and its watersheds. As I understand it the primary purpose of this report is to set protected instream flows for such things as fish, turtles, and recreation. This will then lead to the development of a water management plan for all water users in the watershed to make sure that these flows are maintained.

I am extremely concerned with the accuracy of the report, and potential ramification of its conclusions both upon the use of the Town's existing water supply wells and development of future water resources in the Town of Raymond. My concern is shared by the Town's engineering and hydrogeological consultants, and I believe a number of other towns which abut the Lamprey River.

While I certainly support efforts to protect the states water resources, I am uncomfortable with the information being developed by this report. As a layman, it is difficult for me to provide comment upon this very technical report. However my discomfort is based upon a number of general factors such as:

- The report's technical review committee does not appear to be satisfied with the study's methodology.
- The concerns voiced by a number of the professional engineers and hydrogeologists in the audience questioning the report's methodology and validity of results.
- A number of anomalies within the study which must be over looked to support the analysis. For example, the driest time of the year analysis is supported by flow rates which are greater than the wettest time of the year data.

- The size of the report consisting of 223 pages, with a 19 page summary, and approximately 600 pages of appendices, The sheer preponderance of information brings to mind the saying "if you can't dazzle them with brilliance you should baffle them with ....."
- Many of the reports definitions and explanations defy understanding or even common sense. The following is an example:

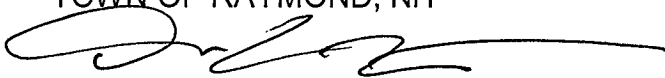
*"The **common flow** is the flow corresponding to the highest habitat magnitude above which the frequency of occurrence begins to decline significantly with incremental increase in habitat magnitude.*

This definition is apparently important in regard to recommended protected instream flows for fish, but its meaning is incomprehensible both to me and our engineering and hydrogeological consultants.

Since all of the Town's existing and potential groundwater sources are within the drainage basin of the Lamprey River, or its tributaries, and will therefore be impacted by the eventual water management plan; I believe it is very important that any report, plan, or legislation regarding the river be approached accurately and scientifically.

As such, based upon only my layman's impression of the report, I must go on record as opposing the conclusions of the report and any water management plan promulgated from or by its conclusions. Further, I have recommended the Town's Board of Selectmen and legislative representatives (I.E. Barnes, Bishop, Kepplar, and Hoezel) be put on notice that this report and any legislation coming from it may not be based upon sound science and/or engineering, nor be in the best interest of the Town of Raymond.

Very truly yours  
TOWN OF RAYMOND, NH



Dennis G. McCarthy  
Public Works Director

CC: Chris Rose, Town Manager